

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No. 03-12567NG

STEPHEN BECKMAN,
Plaintiff,

v.

BULL HN INFORMATION SYSTEMS INC.
Defendant

JOINT SCHEDULING STATEMENT

Pursuant to this Court's Notice of Scheduling Conference and in accordance with Fed. R. Civ. P. 16(b) and Local Rule 16.1, the parties hereby submit the following Joint Statement, which includes: (1) a proposed agenda of matters to be discussed at the scheduling conference and (2) a proposed pretrial schedule (including a plan for initial disclosures, discovery, the filing of motions and a pretrial conference).

Proposed Agenda for Scheduling Conference

I. DISCOVERY

A. AUTOMATIC DISCOVERY

All discovery exchanges required by Fed.R.Civ.P. 26(A)(1) and Local Rule 26.2(A) shall be completed by August 1, 2004.

B. FACT DISCOVERY

1. Non-Expert Written and Oral Deposition Discovery.

All requests for the production of documents and tangible things and written interrogatories shall be served and responded to, and oral fact depositions shall be completed by, February 1, 2005. Requests for admission may be served at any time after the completion of the automatic disclosures by the requesting party but no later than March 1, 2005. No further fact discovery may be had without either the agreement of the applicable party(ies) or by leave of court.

2. Expert Discovery.

Initial Disclosures

Plaintiff shall make the initial disclosures of any expert materials required by Fed.R.Civ.P. 26(A)(2) by December 1, 2004. Defendant shall then have 60 days to make the initial disclosures of any expert materials required by Fed.R.Civ.P. 26(A)(2), on or before February 1, 2005. The parties may make rebuttal expert disclosures by March 1, 2005.

3. Further Discovery.

Further discovery concerning expert witnesses, pursuant to Fed.R.Civ.P. 26(b)(4), including interrogatories and depositions, shall be completed by April 1, 2005.

II. FILING OF MOTIONS

A. AMENDMENTS TO PLEADINGS.

Motions to amend pleadings shall be filed and served on or before July 1, 2004. No further amendments of the pleadings may be made without either the agreement of the applicable party(ies) or by leave of court.

B. DISPOSITIVE MOTIONS.

All dispositive motions under Fed.R.Civ.P. 12 or 56 shall be filed and served on or before May 1, 2005. When any party files any such motion, any other party may file an opposition to the motion within 30 days of the docketing of the original motion. Without further leave of court, the moving party may file a reply to such opposition within ten days of the docketing of the opposition. No other submissions pertaining to the motion may be filed without leave of court.

III. CERTIFICATION

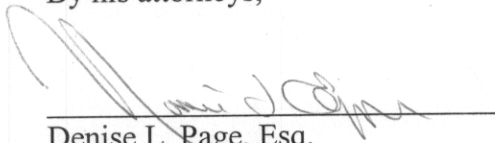
A. Counsel has conferred with their respective parties regarding the costs of conducting the costs of litigation.

B. Plaintiff wishes to use alternative dispute resolution in this matter. Defendant wishes to attempt direct discussions between the parties before formal ADR is undertaken.

IV. PROPOSED PRETRIAL CONFERENCE

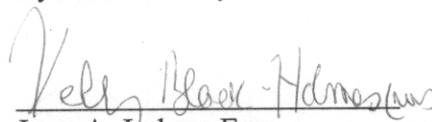
A final pretrial conference pursuant to Fed.R.Civ.P. 16(d) and Local Rule 16.5 will be held at 2:00 p.m. on Wednesday, June 15, 2005, or such other date as may be selected by the Court.

Respectfully submitted,
The Plaintiff,
By his attorneys,



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The Defendant,
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Date: May 7, 2004

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